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Attorneys for Defendant, BEST BUY CO., INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

EIJI KURIHARA individually, and on  
behalf of all others similarly situated,

Plaintiffs,

v.

BEST BUY CO., INC.,

Defendant.

Case No. C06-01884 MHP

**STIPULATION AND ~~PROPOSED~~ ORDER  
REGARDING BEST BUY EMPLOYEE  
DATA**

**Action Filed:** March 10, 2006

**Trial Date:** None Set

WHEREAS, Best Buy possesses personal and private information of their former and current employees, including their names, residential home addresses, home telephone numbers, tax information, and social security numbers; and

WHEREAS, Plaintiff served discovery the compliance with which requires the production or disclosure in this litigation of personal and private information of Best Buy's former and current employees; and

WHEREAS, the parties desire to facilitate the exchange of information relevant to this litigation without a contested discovery dispute, permit Best Buy to comply with its duty to its employees, and preserve the privacy of Best Buy's employees by restricting disclosure of such personal and private information; and

**STIPULATION REGARDING BEST BUY  
EMPLOYEE DATA**

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WHEREAS, the Parties desire to protect the personal information of Best Buy's employees during the pre-class certification period beyond the provisions of the Stipulated Protective Order entered into by the Parties;

NOW THEREFORE, the Parties, by and through their respective undersigned counsel of record, stipulate and agree to the following, which they mutually request the Court to make the subject of a Court Order:

a.. The private information of former or current Best Buy employees produced by Best Buy in this action is CONFIDENTIAL INFORMATION subject to the Stipulated Protective Order.

b. Until such time as a class is certified in this action, the personal information of former and current Best Buy employees produced to Plaintiff by Best Buy shall be viewed and used only by counsel for the putative class, counsel's employees, their investigators and experts pursuant to the Stipulated Protective Order, and not by the representative plaintiff.

Based on the foregoing considerations, **IT IS SO STIPULATED.**

Dated: December 8, 2006

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

By: /s/ Hernaldo J. Baltodano  
Thomas A. Miller  
Hernaldo J. Baltodano  
*Attorneys for Defendant*  
BEST BUY CO., INC.

Dated: December 8, 2006

SCOTT COLE & ASSOCIATES, APC

By: /s/ Mathew R. Bainer  
Scott Edward Cole  
Matthew R. Bainer  
*Attorneys for Plaintiff*  
EIJI KURIHARA

**[PROPOSED] ORDER**

Good cause having been shown,

a.. The private information of former or current Best Buy employees produced by Best Buy in this action is Best Buy's designated "CONFIDENTIAL INFORMATION" subject to the Stipulated Protective Order.

b. Until such time as a class is certified in this action, the personal information of former and current Best Buy employees produced to Plaintiff by Best Buy shall be viewed and used only by counsel for the putative class, counsel's employees, their investigators and experts pursuant to the Stipulated Protective Order, and not by the representative plaintiff.

**IT IS SO ORDERED.**

Dated: December 13, 2006

